

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

SINGULAR COMPUTING LLC,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

Civil Action No. 1:19-cv-12551 FDS

Hon. F. Dennis Saylor IV

**UNOPPOSED MOTION TO PERMIT DEFENDANT GOOGLE LLC
SECURE REMOTE ACCESS TO TRIAL PROCEEDINGS**

Defendant Google LLC respectfully requests that the Court permit its counsel and experts to use a secure, closed-circuit video feed of the trial proceedings provided by Courtroom Connect to enable access by off-site trial teams.

Courtroom Connect is a technology company that provides secure, remote, live video access to courtroom proceedings.¹ Courtroom Connect's technology does not provide remote public access to trial proceedings, and Google does not seek such access.² Instead, the Courtroom Connect service provides secure, closed-circuit live video access to Google's counsel, trial teams, and experts so that they can monitor the trial proceedings without needing to be in the courtroom full time. With large trial teams and geographically dispersed counsel and experts, enabling secure remote video access would help Google's counsel and support staff more efficiently follow the conduct of trial and provide necessary support without needing to be present in the courtroom for all presentation of evidence and argument.

Other courts have approved use of Courtroom Connect's technology for remote, secure video access of trial proceedings for trial teams and their experts. Earlier this month, another judge in this District used Courtroom Connect to provide the parties in that case with secure remote access for a multi-week trial. *See United States v. JetBlue Airways Corp. et al.*, No. 1:23-cv-10511-WGY (D. Mass. 2023), Dkts. 324 (joint motion), 333 (approval). Judge Polster also recently permitted Courtroom Connect to provide closed-circuit video to the parties participating in a multi-week trial in the opioid multi-district litigation in the Northern District of Ohio. *See In re National Prescription Opioid Litig.*, No. 1:17-md-2803 (N.D. Ohio. 2021), Dkt. 3951.

¹ Courtroom Connect provides additional services to litigants and the courts, including the public Wi-Fi internet access in this District.

² Nor is Google seeking to conduct any proceedings remotely during trial using Courtroom Connect.

Courtroom Connect's closed-circuit video feed of the trial includes several strict security measures to ensure proper, limited use of the technology. First, access to the video feed will be limited to specific, authorized counsel, support staff, and experts who have submitted an official consent form and been issued unique login credentials by Courtroom Connect. Second, users signing the consent form agree to strict rules against unauthorized transmission or use of the live feed, such as by videorecording, taking photographs, or sharing access with any members of the public, fact witnesses, or counsel who have not signed a consent form. Third, the access controls that Courtroom Connect provides (including the consent form and unique login credentials) alleviate concerns that sequestered fact witnesses could gain unauthorized access to the feed. Fourth, the Court has the option of monitoring who is watching the live feed, if it desires. Finally, should any unauthorized access to the closed-circuit video occur, the Court has the option of ending the stream for certain individuals or in its entirety.

Providing this access will not impose any undue burden on the court. As Lou Freitas, the CEO of Courtroom Connect, states, Courtroom Connect's presence does not require a camera operator to be in the courtroom. Freitas Decl. ¶ 4. A technician can remain on standby near the courtroom to assist Google with any issues. *Id.* ¶ 7. Google will also bear the full cost of using Courtroom Connect's services.

Counsel for Google conferred with counsel for Singular regarding this motion. Counsel for Singular indicated that they do not oppose the motion.

For those reasons, Google respectfully requests that the Court approve Courtroom Connect to provide a secure live video feed to its counsel and experts in this case.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I certify that this document is being filed through the Court's electronic filing system, which serves counsel for other parties who are registered participants as identified on the Notice of Electronic Filing (NEF). Any counsel for other parties who are not registered participants are being served by first class mail on the date of electronic filing.

/s/ Nathan R. Speed

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